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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

ELIZABETH ANNE DEVAN-SONG,

Case No.: 6:20-CV-02126-MC

Plaintiff,

MOTION FOR EXTENSION OF TIME  
TO APPEAR

v.

OREGON STATE UNIVERSITY and  
PENELOPE DAUGHERTY,

Defendant.

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**RULE 7-1 CERTIFICATION**

Pursuant to LR 7-1, counsel for defendants Oregon State University and Penelope Daugherty (collectively, “defendants”), conferred with plaintiff’s counsel regarding this motion. Plaintiff’s counsel stated that she would not object to an extension until February 15, 2021 and also stated that plaintiff intended to file an amended complaint.

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**MOTION**

Defendants request an extension of time to respond to plaintiff's complaint from January 27, 2021 to March 8, 2021 (60 days from the date when defendants accepted service of the complaint by email at plaintiff's request). The extension is necessary because defense counsel was recently retained and needs time to obtain and review background information to prepare a responsive pleading. Additionally, defense counsel has other time-sensitive matters pending, including an arbitration scheduled for February 3-4, 2021.

This motion is not made for any improper purpose or to cause undue delay. This motion is supported by the accompanying declaration of Melissa J. Healy.

DATED: January 26, 2021.

STOEL RIVES LLP

/s/ Melissa J. Healy

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